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Attorneys for Federal Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

GEERTSON SEED FARMS INC., <u>et al.</u>)	Case No. C-06-1075 (CRB)
)	
Plaintiffs,)	STIPULATION FOR EXTENSION OF TIME
)	TO FILE SECOND JOINT CASE
vs.)	MANAGEMENT STATEMENT;
)	[PROPOSED] ORDER
MIKE JOHANNNS, <u>et al.</u>)	
)	
Defendants,)	Date: September 15, 2006
)	Time: 8:30 a.m.
)	Judge: Hon. Charles R. Breyer
)	
)	

On August 31, 2006, the parties participated in a settlement conference with Magistrate Judge Elizabeth D. Laporte. The parties were unable to reach an agreement on the terms of a settlement. Because the parties believe that this case is unlikely to settle, the parties intend to propose a schedule for the resolution of this case.

However, due to the travel schedules of counsel for Defendants – who returned to Washington, DC from San Francisco on September 1, 2006 – and the Labor Day holiday on September 4, 2006, the parties have not had an adequate opportunity to confer with respect to a proposed briefing schedule. Thus, the parties respectfully request an extension of six days, through September 11, 2006, to file their second joint case management statement. This extension will permit the parties to confer in an attempt to resolve disputes regarding procedural issues and reach agreement on the terms of a proposed briefing schedule for the Court's consideration.

Respectfully submitted,

Dated: September 5, 2006

/s/ William B. Rostov (by KBF)

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Division

Wildlife and Marine Resources Section

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GEERTSON SEED FARMS INC., et al.) Case No. C-06-1075 (CRB)
Plaintiffs,) ~~PROPOSED~~ ORDER
vs.)
MIKE JOHANNNS, et al.,)
Defendants,)

Having considered the parties' Stipulation for Extension of Time To File Second Joint Case Management Statement, IT IS HEREBY ORDERED that the parties may file their second joint case management statement on September 11, 2006.

Dated: September 6, 2006

Hon. Charles R. Breyer
United States District Judge

